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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

CR24-07998 TUC-JCH(LCK)

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3 District of Arizona
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7 IN THE UNITED STATES DISTRICT COURT
8
9 FOR THE DISTRICT OF ARIZONA

10 United States of America,

11 Plaintiff,

12 vs.

13 Christian Flores-Lugo (Count One),
14 Jorge Badilla-Iriarte (Count Two),

15 Defendants.

16 I N D I C T M E N T

17 Violations:

18 U.S.C. § 554(a)
(Smuggling of Goods from the United
19 States)
(Count One)

20 U.S.C. §§ 922(a)(6) and 924(a)(2)
(Making False Statements in Connection
21 With Acquisition of Firearms)
(Count Two)

22 **THE GRAND JURY CHARGES:**

23 COUNT ONE

24 Between on or about July 1, 2022, and on or about September 8, 2022, in the District
25 of Arizona, CHRISTIAN FLORES-LUGO did knowingly and fraudulently export and
26 send from the United States, any merchandise, article, or object contrary to any law or
27 regulation of the United States, and received, concealed, bought, sold, and in any manner
28 facilitated the transportation, concealment, and sale of such merchandise, article or object,
that is: two (2) AK-47 rifles, knowing the same to be intended for exportation contrary to
any law or regulation of the United States, to wit: Title 50, United States Code, Section
4819; Title 15, Code of Federal Regulations, Part 774; and Title 15, Code of Federal
Regulations, Part 738; in violation of Title 18, United States Code, Section 554(a).

COUNT TWO

2 On or about August 10, 2022, in the District of Arizona, JORGE BADILLA-
3 IRIARTE did knowingly made false statements and representations in connection with the
4 acquisition of firearms to a federally license firearms dealer, which were intended and
5 likely to deceive the dealer as to a fact material to the lawfulness of the sale of firearm by
6 the dealer, which was licensed under the provisions of Chapter 44 of Title 18, United States
7 Code, with respect to information required by the provisions of Chapter 44 of Title 18,
8 United States Code, to be kept in the records of the dealer, in that JORGE BADILLA-
9 IRIARTE stated that he was the actual transferee/buyer of the firearm, whereas in truth and
10 fact, he was knowingly acquiring the firearm on behalf of another individual, CHRISTIAN
11 FLORES-LUGO:, in violation of Title 18, United States Code, Sections 922(a)(6) and
12 924(a)(2).

A TRUE BILL

/S/

FOREPERSON OF THE GRAND JURY
Dated: November 13, 2024

18 GARY M. RESTAINO
United States Attorney
District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

/S/

MATTHEW C. CASSELL
Assistant U.S. Attorney